

Fill in this information to identify your case:

United States Bankruptcy Court for the:

EASTERN DISTRICT OF VIRGINIA

Case number (if known) Chapter **11**

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

4/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name	<u>Blue Ridge Arsenal, Inc.</u>	
<hr/>		
2. All other names debtor used in the last 8 years <small>Include any assumed names, trade names and <i>doing business as</i> names</small>		
<hr/>		
3. Debtor's federal Employer Identification Number (EIN)	54-1491644	
<hr/>		
4. Debtor's address	Principal place of business <u>14725 K Flint Lee Road</u> <u>Chantilly, VA 20151</u> <small>Number, Street, City, State & ZIP Code</small> <u>Fairfax</u> <small>County</small>	Mailing address, if different from principal place of business <hr/> <small>P.O. Box, Number, Street, City, State & ZIP Code</small> Location of principal assets, if different from principal place of business <hr/> <small>Number, Street, City, State & ZIP Code</small>
<hr/>		
5. Debtor's website (URL)	<u>http://www.blueridgearsenal.com/</u>	
<hr/>		
6. Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____	
<hr/>		

Debtor **Blue Ridge Arsenal, Inc.**
Name

Case number (if known)

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

7139**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

Check one:

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**☒ No.☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?☐ No☒ Yes.

List all cases. If more than 1, attach a separate list

Debtor	Blue Ridge Arsenal at Winding Brook LLC	Relationship	Affiliate
District	Eastern District of Virginia, Alexandria Division	When	9/18/17
		Case number, if known	17-13138-BFK

Debtor **Blue Ridge Arsenal, Inc.**
Name

Case number (if known)

11. Why is the case filed in this district?*Check all that apply:*

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention?** (*Check all that apply.*)☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? _____

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other _____**Where is the property?** _____

Number, Street, City, State & ZIP Code

Is the property insured?☐ No☐ Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information**13. Debtor's estimation of available funds***Check one:*

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000**15. Estimated Assets**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☒ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion**16. Estimated liabilities**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

Debtor **Blue Ridge Arsenal, Inc.**
Name

Case number (if known)

Request for Relief, Declaration, and Signatures**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **February 8, 2018**
MM / DD / YYYY**X /s/ Earl L. Curtis**

Signature of authorized representative of debtor

Earl L. Curtis

Printed name

Title **President****18. Signature of attorney****X /s/ Robert M. Marino**

Signature of attorney for debtor

Date **February 8, 2018**

MM / DD / YYYY

Robert M. Marino

Printed name

Redmon Peyton & Braswell, LLP

Firm name

**510 King Street
Suite 301
Alexandria, VA 22314**

Number, Street, City, State & ZIP Code

Contact phone **703-684-2000**Email address **rmmarino@rpb-law.com****VSBA #26076 VA**

Bar number and State

Fill in this information to identify the case:

Debtor name Blue Ridge Arsenal, Inc.

United States Bankruptcy Court for the: EASTERN DISTRICT OF VIRGINIA

Case number (if known) _____

☐ Check if this is an amended filing

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ Other document that requires a declaration **Creditor Address Matrix**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 8, 2018

X /s/ Earl L. Curtis

Signature of individual signing on behalf of debtor

Earl L. Curtis

Printed name

President

Position or relationship to debtor

Fill in this information to identify the case:

Debtor name **Blue Ridge Arsenal, Inc.**
 United States Bankruptcy Court for the: **EASTERN DISTRICT OF VIRGINIA**
 Case number (if known): _____

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
5EI LLC 1751 Pinnacle Drive, #600 Mc Lean, VA 22102		Website design and maintenance services				\$20,000.00
Access National Bank 106 Catoctin Circle, SE Leesburg, VA 20175		All assets, including inventory, furniture, fixtures and equipment, accounts, chattel paper, instruments and general intangibles		\$21,403.81	\$500,000.00	\$21,403.81
Access National Bank 106 Catoctin Circle, SE Leesburg, VA 20175		All assets, including inventory, furniture, fixtures and equipment, accounts, chattel paper, instruments and general intangibles		\$613,686.25	\$500,000.00	\$113,686.25
AcuSport Corporation One Hunter Place Bellefontaine, OH 43311		Firearm and accessories supplier				\$43,421.14
Air Cleaning Technologies, Inc 44966 Falcon Place, Suite 190 Sterling, VA 20166		Air filters and related services				\$26,208.29
Big Rock Sports LLC 1141 Jay Lane Graham, NC 27253		Firearms and ammunitions supplier				\$17,140.50

Debtor **Blue Ridge Arsenal, Inc.**
Name

Case number (if known)

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Channel Partners Capital, LLC 11100 Wayzata Blvd., Ste 305 Minnetonka, MN 55305		Business loan				\$100,000.00
Commercial Express HVAC, Inc. 3656 Centerview Drive, Ste. 12 Chantilly, VA 20151		HVAC services				\$10,651.00
Davidson's Inc. 6100 Wilkinson Drive Prescott, AZ 86301		Firearms supplier				\$9,709.44
Ecology Mir Group, LLC 10432 Balls Ford Rd, Ste. 300 Manassas, VA 20109		Firearms and ammunitions supplier				\$6,097.35
KeepSafe, LLC P.O. Box 0304 Springfield, VA 22150-0304		Firearms accessories supplier				\$10,330.99
Mark Warner 7441 Willoughby Lane #103 Chantilly, VA 20152		Firearm consignment sales				\$10,000.00
Mercedes-Benz Financial P. O. Box 5209 Carol Stream, IL 60197-5209		Automobile lease (expired December 1, 2017 and vehicle surrendered)				\$9,379.09
Potomac Environmental Inc. P.O. Box 1836 Stafford, VA 22555-1836		Filter disposal services				\$8,142.70
Pyramex Safety Products 281 Moore Lane Collierville, TN 38017		Firearms accessories (eye protection)				\$5,707.80
Robert S. Naftal, P.C. 11260 Roger Bacon Drive #504 Reston, VA 20190		Legal services				\$20,645.87

Debtor **Blue Ridge Arsenal, Inc.**
Name

Case number (if known)

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Sharad and Seema Gupta Trust c/o Sharad and Seema Gupta 6594 Ellies Way Fairfax Station, VA 22039		Business Loan				\$100,000.00
US Business Funding 1 MacArthur Place, Suite 350 Santa Ana, CA 92707		All assets, including inventory, furniture, fixtures and equipment, accounts, chattel paper, instruments and general intangibles		\$95,158.00	\$500,000.00	\$95,158.00
Wells Fargo Financial Leasing P.O. Box 10306 Des Moines, IA 50306-0306		Equipment lease for two HP Printers				\$6,500.00
Winding Brook Range LLC 6594 Ellies Way Fairfax Station, VA 22039		Judgment arising out of guaranty of lease obligation for Blue Ridge Arsenal at Winding Brook LLC	Disputed			\$816,801.92

5EI LLC
1751 Pinnacle Drive, #600
Mc Lean, VA 22102

Access National Bank
106 Catoctin Circle, SE
Leesburg, VA 20175

AcuSport Corporation
One Hunter Place
Bellefontaine, OH 43311

Air Cleaning Technologies, Inc
44966 Falcon Place, Suite 190
Sterling, VA 20166

Big Rock Sports LLC
1141 Jay Lane
Graham, NC 27253

Blue Rdg Arsenl @ Windng Brook
c/o Earl l. Curtis, Manager
14725 K Flint Lee Road
Chantilly, VA 20151

Brandon Honeycutt
7205 Noland Road
Falls Church, VA 22042

Brenda Burke
6318 Bluestone Place
Clifton, VA 20124

Channel Partners Capital, LLC
11100 Wayzata Blvd., Ste 305
Minnetonka, MN 55305

Christian Shultz
6806 Wandering Lane
Clifton, VA 20124

CMI Credit Mediators, Inc.
P.O. Box 456
Upper Darby, PA 19082-0456

Commercial Express HVAC, Inc.
3656 Centerview Drive, Ste. 12
Chantilly, VA 20151

Commerical Express HVAC, Inc.
P.O. Box 710748
Herndon, VA 20171

Commonwealth of Virginia
Department of Taxation
Legal Unit, P.O. Box 2156
Richmond, VA 23218

Davidson's Inc.
6100 Wilkinson Drive
Prescott, AZ 86301

Deborah L. Curtis
11021 Burywood Lane
Reston, VA 20194

Donnel Dover
2302 Whitetail Court
Reston, VA 20191

Earl L. Curtis
1855 St. Francis Court, #301
Reston, VA 20190

Ecology Mir Group, LLC
10432 Balls Ford Rd, Ste. 300
Manassas, VA 20109

Fairfax County Dept. Taxation
Fx Cty Gov't Center, Ste. 223
12000 Government Center Pkwy
Fairfax, VA 22035

Flint Lee Road, LLC
c/o Rosenthal Properties
1945 Old Gallows Rd., Ste. 300
Vienna, VA 22182

Hillcrest, Davidson & Assocs.
715 N. Glenville, Suite 450
Richardson, TX 75081

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Jaime B. Wisegarver, Esq.
2100 E. Cary Street
Richmond, VA 23223

Jennifer Wolverson
708 Donaldson Lane SW
Leesburg, VA 20175

Joel L. Dahnke, Esq
11350 Random Hills Road
Suite 700
Fairfax, VA 22030

John Summer
814 South Colonial Avenue
Sterling, VA 20164

KeepSafe, LLC
P.O. Box 0304
Springfield, VA 22150-0304

Kevin L. Leahy, Esq.
9300 Grant Ave., #200
Manassas, VA 20110

Kevin M. O'Donnell
Henry & O'Donnell, PC
300 N. Washington St., Ste 204
Alexandria, VA 22314

Mark Warner
7441 Willoughby Lane #103
Chantilly, VA 20152

Mark Warner
7441 Willoughby Lane #103
Manassas, VA 20109

Mercedes-Benz Financial
P. O. Box 5209
Carol Stream, IL 60197-5209

Michael Monaghan
3619 N Delaware St
Arlington, VA 22207

Morgan Cohen & Bach LLC
7225 N. Mona Lisa Rd, Ste. 200
Tucson, AZ 85741

Oakley Inc.
One Icon
Foothill Ranch, CA 92610

P. George Eliades, II, Esq.
The Eliades Law Firm, PLLC
14000 N. Enon Church Road
Chester, VA 23836

Potomac Environmental Inc.
P.O. Box 1836
Stafford, VA 22555-1838

Pyramex Safety Products
281 Moore Lane
Collierville, TN 38017

Pyramex Safety Products
P.O. Box 1000, Dept. 324
Memphis, TN 38148-0324

Rafael Barreto-Sosa
5426 Long Boat Court
Fairfax, VA 22032

Robert Gallagher
1798 Clovermeadow Drive
Vienna, VA 22182

Robert S. Naftal, P.C.
11260 Roger Bacon Drive #504
Reston, VA 20190

Robert Thibeault Jr
3037 Jefferson Woods Lane
Amissville, VA 20106

Sandy Spring Bank
c/o Henry & O'Donnell, PC
300 N. Washington St., Ste 204
Alexandria, VA 22314

Sharad and Seema Gupta Trust
c/o Sharad and Seema Gupta
6594 Ellies Way
Fairfax Station, VA 22039

Skyline Publishing
P.O. Box 9014
Peoria, IL 61612

Stacey M. Aivaliotis
2330 Dulles Station Boulevard
#2453
Herndon, VA 20171

Summer Wagenfurth
12672 Magna Carta Road
Herndon, VA 20171

Unidentified Customers

US Business Funding
1 MacArthur Place, Suite 350
Santa Ana, CA 92707

Wells Fargo Financial Leasing
P.O. Box 10306
Des Moines, IA 50306-0306

Wells Fargo Financial Leasing
800 Walnut, 4th Floor
Des Moines, IA 50309

William Knudsen
3712 Woodburn Road
Annandale, VA 22003

Winding Brook Range LLC
6594 Ellies Way
Fairfax Station, VA 22039

**United States Bankruptcy Court
Eastern District of Virginia**

In re **Blue Ridge Arsenal, Inc.**

Debtor(s)

Case No.

Chapter

11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Blue Ridge Arsenal, Inc.** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

☒ None [*Check if applicable*]

February 8, 2018

Date

/s/ Robert M. Marino

Robert M. Marino

Signature of Attorney or Litigant
Counsel for **Blue Ridge Arsenal, Inc.**
Redmon Peyton & Braswell, LLP

**510 King Street
Suite 301
Alexandria, VA 22314
703-684-2000 Fax:703-684-5109
rmmarino@rpb-law.com**

**United States Bankruptcy Court
Eastern District of Virginia**

In re Blue Ridge Arsenal, Inc.

Debtor.

Case No.
Chapter

11

STATEMENT REGARDING AUTHORITY TO SIGN AND FILE PETITION

I, Earl L. Curtis, declare under penalty of perjury that I am the President of Blue Ridge Arsenal, Inc. ("Corporation"), a Virginia corporation, and that the following is a true and correct copy of the Resolutions adopted by the Board of Directors of the Corporation at a special meeting duly called and held on the 8th day of February, 2018.

"Whereas, it is in the best interest of the Corporation to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that Earl L. Curtis, President of the Corporation, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the Corporation; and

Be It Further Resolved, that Earl L. Curtis, President of the Corporation, is authorized and directed to appear in all bankruptcy proceedings on behalf of the Corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the Corporation in connection with such bankruptcy case; and

Be It Further Resolved, that Earl L. Curtis, President of the Corporation, is authorized and directed to employ Robert M. Marino, Esq., and the law firm of Redmon Peyton & Braswell, LLP, as counsel to represent the Corporation in such bankruptcy case."

Date February 8, 2018

Signed /s/ Earl L. Curtis

Earl L. Curtis, President

Resolution of Board of Directors
of
Blue Ridge Arsenal, Inc.

Whereas, it is in the best interest of the Corporation to file a voluntary petition in the the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that Earl L. Curtis, President of the Corporation, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the Corporation; and

Be It Further Resolved, that Earl L. Curtis, President of the Corporation, is authorized and directed to appear in all bankruptcy proceedings on behalf of the Corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the Corporation in connection with such bankruptcy case; and

Be It Further Resolved, that Earl L. Curtis, President of the Corporation, is authorized and directed to employ Robert M. Marino, Esq., and the law firm of Redmon Peyton & Braswell, LLP, as counsel to represent the Corporation in such bankruptcy case.

Date February 8, 2018

Signed /s/ Earl L. Curtis
Earl L. Curtis, Director

Date February 8, 2018

Signed /s/ Deborah L. Curtis
Deborah L. Curtis, Director